

APPENDIX G

OTHER AGENCY COMMENTS / THREATENED AND ENDANGERED SPECIES SCREENING

~~United States Environmental Protection Agency (USEPA)
USEPA response to draft permit—DATE~~

Virginia Department of Health (VDH)
VDH memo – January 29, 2014

DEQ VPDES Permits Threatened and Endangered (T&E) Species Coordination Form
January 23, 2014

United States Fish and Wildlife Service (USFWS)
USFWS T&E response – January 27, 2014

Virginia Department of Conservation and Recreation (VDCR)
VDCR T&E letter – February 18, 2014
DEQ response letter – February 20, 2014

~~Virginia Department of Game and Inland Fisheries (VDGIF)
VDGIF T&E comments—DATE
DEQ responses—DATE~~



COMMONWEALTH of VIRGINIA

Cynthia C. Romero, MD, FAAFP
State Health Commissioner

DEPARTMENT OF HEALTH
OFFICE OF DRINKING WATER
Abingdon Field Office


John J. Aulbach II, PE
Director, Office of Drinking Water

454 E. Main Street
Abingdon, VA 24210
Phone: 276-676-5650
Fax: 276-676-5659

VPDES REVIEW MEMORANDUM

County: Pulaski County
Sewerage - Peppers' Ferry WWTP
VPDES Application

To: Bob Tate, PE, Field Engineer
Department of Environmental Quality, Roanoke Regional Office

From:  Charles Puckett, P.E., Engineering Field Director
Office of Drinking Water, Abingdon Field Office

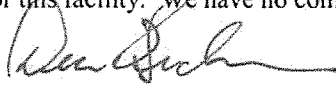
Date: January 29, 2014

Subject: VPDES Application Number VA0062685 (Existing discharge)


Owner: Pepper's Ferry Regional Wastewater Treatment Authority

Comments:

☒ There are no public water supply intakes located within 15 miles downstream of the discharge. We recommend a minimum Reliability Class III for this facility. We have no comments on the discharge.

Reviewer: Dean Henderson, District Engineer 

cc: Pulaski County Health Department, Attn: Dr. Molly O'Dell

 <p>VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY</p>	<p align="center">VPDES PERMITS</p> <p align="center">Threatened and Endangered Species Coordination</p>
<p>To:</p> <p><input checked="" type="checkbox"/> DGIF, Environmental Review Coordinator</p> <p><input checked="" type="checkbox"/> DCR</p> <p><input checked="" type="checkbox"/> USFWS, T/E Review Coordinator</p> <p>From: Bob Tate</p>	<p>Date Sent: January 23, 2014</p> <p>Permit Number: VA0062685</p>
<p>Facility Name: Pepper's Ferry Regional Wastewater Treatment Authority</p> <p>Contact: Clarke Wallcraft, Executive Director</p> <p>Phone: (540) 639-3947</p> <p>Address: P.O. Box 2950; Radford, VA 24143</p> <p>Facility Location: 7797 Mason Street (Pulaski Co.)</p> <p>Outfall Location (from application) Latitude: 37° 10' 59" Longitude: 80° 33' 43"</p> <p>USGS Quadrangle: Radford North, VA</p>	<p>Receiving Stream: New River</p> <p>Receiving Stream Flow Statistics (from 2009 permit reissuance)</p> <p>1 Day, 30-Year Low Flow: 409 MGD 1 Day, 10-Year Low Flow: 436 MGD 7 Day, 10-Year Low Flow: 546 MGD 30 Day, 10-Year Low Flow: 634 MGD 30 Day, 5-Year Low Flow: 712 MGD 1 Day, 10-Year High Flow: 518 MGD 7 Day, 10-Year High Flow: 761 MGD 30 Day, 10-Year High Flow: 1056 MGD Harmonic Mean Flow: 1509 MGD</p>
<p>Effluent Characteristics: 1 outfall discharging treated domestic and industrial wastewaters</p> <p>Maximum Daily Flow: 12.8 MGD (recent 36 months)</p>	<p>Species Search Results (or attach database report and map)</p> <p>Identified aquatic threatened and endangered species: Roanoke Logperch, Big Sandy Crayfish, Orange-fin Madtom</p>

Disinfection is by ultra-violet radiation. A draft permit has not yet been developed.

DGIF: ESSProjects@dgif.virginia.gov

DCR: nhreview@dcv.virginia.gov

USFWS: susan_lingenfelter@fws.gov and brett_hillman@fws.gov

From: Hillman, Brett [brett_hillman@fws.gov]
Sent: Monday, January 27, 2014 11:08 AM
To: Tate, Robert (DEQ)
Subject: Re: Reissuance of VPDES Permit VA0062685 - Pepper's Ferry Regional Wastewater Treatment Authority

Hi Bob,

Thanks for providing us with the opportunity to comment. The Roanoke logperch (*Percina rex*) is not known to occur in the New River, so, from a federally listed species perspective, I see no need to comment on this permit reissuance. However, I will applaud the use of UV treatment at this facility!

Hope all is well,
Brett

Brett Hillman
Fish and Wildlife Biologist
U.S. Fish & Wildlife Service
Virginia Field Office
6669 Short Lane
Gloucester, VA 23061

Phone: 804-693-6694 ext. 156
Fax: 804-693-9032
Email: brett_hillman@fws.gov

On Thu, Jan 23, 2014 at 1:49 PM, Tate, Robert (DEQ) <Bob.Tate@deq.virginia.gov> wrote:
VPDES Permit VA0062685 for the Pepper's Ferry Regional Wastewater Treatment Authority expires September 30, 2014. DEQ recently received a complete application for permit reissuance.

DEQ's VPDES Permits Threatened and Endangered Species Coordination form is attached.

Please review per the interagency VPDES Memo of Understanding from 2007.

DEQ intends to reissue this permit by June 30, 2014.

Don't hesitate to contact me about this permit reissuance.

Bob Tate
water permit writer
DEQ - Blue Ridge Regional Office
phone: 540-562-6774 (office) or 540-761-6188 (mobile)



COMMONWEALTH of VIRGINIA
DEPARTMENT OF CONSERVATION AND RECREATION

600 East Main Street, 24th Floor
Richmond, Virginia 23219
(804) 786-6124

February 18, 2014

Bob Tate
DEQ – Blue Ridge Regional Office
3019 Peters Creek Road
Roanoke, VA 24019

Re: VA0062685, Peppers Ferry Regional Wastewater Treatment Authority

Dear Mr. Tate:

The Department of Conservation and Recreation's Division of Natural Heritage (DCR) has searched its Biotics Data System for occurrences of natural heritage resources from the area outlined on the submitted map. Natural heritage resources are defined as the habitat of rare, threatened, or endangered plant and animal species, unique or exemplary natural communities, and significant geologic formations.

According to the information currently in our files, the Hellbender (*Cryptobranchus alleganiensis*, G3G4/S2S3/NL/NL) and the Green floater (*Lasmigona subviridis*, G3/S2/NL/LT) have been historically documented in the project vicinity. The Hellbender, a large, completely aquatic salamander, prefers larger, clear, and fast-flowing streams of the Mississippi drainage (Martof, et. al, 1980). In Virginia, it is documented from the Holston, Clinch, Powell and New River drainages (Pague, 1991). The Hellbender depends on cool, flowing, well-oxygenated water, and it needs a coarse (rocky) substrate (NatureServe, 2009).

Threats to this species include habitat alteration from impoundments or channelization, and water pollution (Pague, 1991). In agricultural areas, siltation may bury the rocky substrates it requires (NatureServe, 2009). In addition, Hellbenders do not tolerate human recreational use of their habitat (NatureServe, 2009).

The Green floater, a rare freshwater mussel, ranges from New York to North Carolina in the Atlantic Slope drainages, as well as the New and Kanawha River systems in Virginia and West Virginia (NatureServe, 2009). In Virginia, there are records from the New, Roanoke, Chowan, James, York, Rappahannock, and Potomac River drainages. Throughout its range, the Green floater appears to prefer the pools and eddies with gravel and sand bottoms of smaller rivers and creeks, smaller channels of large rivers (Ortman, 1919) or small to medium-sized streams (Riddick, 1973). Please note that this species has been listed as state threatened by the Virginia Department of Game and Inland Fisheries (VDGIF).

Considered good indicators of the health of aquatic ecosystems, freshwater mussels are dependent on good water quality, good physical habitat conditions, and an environment that will support populations of host fish species (Williams et al., 1993). Because mussels are sedentary organisms, they are sensitive to water quality degradation

related to increased sedimentation and pollution. They are also sensitive to habitat destruction through dam construction, channelization, and dredging, and the invasion of exotic mollusk species.

To minimize impacts to aquatic resources, DCR recommends the use of uv/ozone to replace chlorination disinfection and utilization of new technologies as they become available to improve water quality. DCR also recommends adhering to the proposed EPA standards for ammonia limits for freshwater mussels. Finally, due to the legal status of the Green floater, DCR recommends coordination with Virginia's regulatory authority for the management and protection of this species, the VDGIF, to ensure compliance with the Virginia Endangered Species Act (VA ST §§ 29.1-563 – 570).

There are no State Natural Area Preserves under DCR's jurisdiction in the project vicinity.

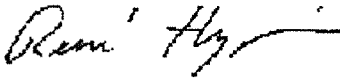
Under a Memorandum of Agreement established between the Virginia Department of Agriculture and Consumer Services (VDACS) and the DCR, DCR represents VDACS in comments regarding potential impacts on state-listed threatened and endangered plant and insect species. The current activity will not affect any documented state-listed plants or insects.

New and updated information is continually added to Biotics. Please contact DCR for an update on this natural heritage information if a significant amount of time passes before it is utilized.

The VDGIF maintains a database of wildlife locations, including threatened and endangered species, trout streams, and anadromous fish waters that may contain information not documented in this letter. Their database may be accessed from <http://vafwis.org/fwis/> or contact Gladys Cason (804-367-0909 or Gladys.Cason@dgif.virginia.gov).

Should you have any questions or concerns, feel free to contact René Hypes at 804-371-2708. Thank you for the opportunity to comment on this project.

Sincerely,



S. René Hypes
Project Review Coordinator

CC: Ernie Aschenbach, VDGIF

Literature Cited

- Martof, B.S., W.M. Palmer, J.R. Bailey, and J.R. Harrison III. 1980. Amphibians and reptiles of the Carolinas and Virginia. University of North Carolina Press. Chapel Hill, North Carolina.
- NatureServe. 2009. NatureServe Explorer: An online encyclopedia of life [web application]. Version 7.1. NatureServe, Arlington, Virginia. Available <http://www.natureserve.org/explorer>. (Accessed: April 6, 2010).
- Ortman, A.E. 1919. A monograph of the naiades of Pennsylvania, Part 3: Systematic account of the genera and species. Mem. Carnegie Mus. 8:1-384.
- Pague, C.A. 1991. Hellbender. In Virginia's Endangered Species: Proceedings of a Symposium. K. Terwilliger ed. The McDonald and Woodward Publishing Company. Blacksburg, Virginia.
- Riddick, M.B. 1973. Freshwater mussels of the Pamunkey River system, Virginia. M.S. Thesis, Virginia Commonwealth University, Richmond, VA 105pp.
- Williams, J.D., M.L. Warren, Jr., K.S. Cummings, J.L. Harris, and R.J. Neves. 1993. Conservation status of freshwater mussels of the United States and Canada. Fisheries 18: 6-9.



COMMONWEALTH of VIRGINIA

Molly Joseph Ward
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY

Blue Ridge Regional Office

www.deq.virginia.gov

Lynchburg Office
7705 Timberlake Road
Lynchburg, Virginia 24502
(434) 582-5120
Fax (434) 582-5125

David K. Paylor
Director

Robert J. Weld
Regional Director

Roanoke Office
3019 Peters Creek Road
Roanoke, Virginia 24019
(540) 562-6700
Fax (540) 562-6725

February 20, 2014

S. René Hypes, Project Review Coordinator
Virginia Department of Conservation and Recreation
600 East Main Street, 24th Floor
Richmond, VA 23219

RE: Reissuance of VPDES Permit VA0062685 – Pepper's Ferry Regional Wastewater Treatment Authority

Dear Ms. Hypes:

This letter is the Virginia Department of Environmental Quality's (DEQ) response to your letter dated February 18, 2014, concerning reissuance of VPDES Permit VA0062685 for the Pepper's Ferry Regional Wastewater Treatment Authority (PFRWTA). Your letter identifies two species historically documented in the vicinity, *Cryptobranchus alleganiensis* (Hellbender) and *Lasmigona subviridis* (Green floater). Your letter indicates the Green floater has state legal status as a threatened species.

Your letter contains three recommendations:

1. "To minimize impacts to aquatic resources, DCR recommends the use of uv/ozone to replace chlorination disinfection and utilization of new technologies as they become available to improve water quality."
2. "DCR also recommends adhering to the proposed EPA standards for ammonia limits for freshwater mussels."
3. "Finally, due to the legal status of the Green floater, DCR recommends coordination with ... VDGIF, to ensure compliance with the Virginia Endangered Species Act"

The following are DEQ responses to the recommendations:

1. PFRWTA replaced chlorine disinfection with ultraviolet disinfection in July, 2012.
2. The only legally applicable ammonia criteria for evaluating potential ammonia toxicity are in Virginia's Water Quality Standards.
3. DEQ forwarded USFWS, VDGIF, and VDCR (by e-mail) a VPDES Permits Threatened and Endangered Species Coordination form on January 23, 2014. The form included screening information. However, the permit writer did not did not identify the Green floater on the form because he did not find the species identified in a VDGIF database search. VDGIF is copied on this letter.

If you have any questions or concerns about this permit reissuance, don't hesitate to contact me at 540-562-6774 or at bob.tate@deq.virginia.gov.

Sincerely,

Robert S. Tate
Water Permit Writer

CC: VDGIF – Ernie Aschenbach